

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

IVELISSE G. RODRIGUEZ and
WILFREDO RODRIGUEZ,
individually and on behalf of the classes
defined herein,

Plaintiffs,

v.

CAPITAL ONE HOME LOANS, LLC,
HSBC MORTGAGE SERVICES, INC.,
MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, and
DOES 1-5,

Defendants.

No. 08 CV 1723

Judge David H. Coar

Magistrate Judge Michael T. Mason

**DEFENDANT HSBC MORTGAGE SERVICES, INC.'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant HSBC Mortgage Services, Inc. ("HSBC"), by its attorneys, respectfully moves this Court for a 30 day extension of time to answer or otherwise plead in response to the complaint filed in this matter by Plaintiffs Ivelisse G. Rodriguez and Wilfredo Rodriguez, individually and on behalf of the classes defined in said complaint ("Plaintiffs"). In support of this Motion, HSBC states:

1. On March 25, 2008, Plaintiffs filed a civil action against Capital One Home Loans, LLC ("Capital One"), HSBC, Mortgage Electronic Registration Systems ("MERS"), and Does 1-5.

2. Service was effected on HSBC on March 31, 2008. HSBC's time to answer or otherwise plead currently expires on April 21, 2008.

3. HSBC requests that it be given until and including May 20, 2008, to answer or otherwise plead to the complaint.

4. This is HSBC's first request for an extension of time, and is made in good faith and not for purposes of delay.

5. Plaintiffs have agreed to HSBC's request for extension of time to answer or otherwise plead until and including May 20, 2008. This agreement was confirmed via letter dated April 18, 2008, attached hereto as Exhibit A.

WHEREFORE, HSBC respectfully requests that this Court enter an Order granting it until and including May 20, 2008 to answer or otherwise plead to the complaint, and for any and all other or further relief as this Court deems appropriate.

Respectfully submitted,

HSBC MORTGAGE SERVICES, INC.

By: /s/ Stewart T. Kusper
One of Its Attorneys

Stewart T. Kusper
BeLinda I. Mathie
KATTEN MUCHIN ROSENMAN LLP
525 West Monroe Street
Chicago, Illinois 60661-3693
(312) 902-5200 (Telephone)
(312) 902-1061 (Facsimile)

#60641382

EXHIBIT A

Katten

Katten Muchin Rosenman LLP

525 W. Monroe Street
Chicago, IL 60661-3693
312.902.5200 tel
312.902.1061 fax

BELINDA I. MATHIE
belinda.mathie@kattenlaw.com
312.902.5283 direct
312.577.4482 fax

April 18, 2008

Via E-Mail and U.S. Mail

Al Hofeld, Jr. (al@alhofeldlaw.com)
Law Offices of Al Hofeld, Jr., LLC
and the Social Justice Project
208 South LaSalle Street, Suite 1650
Chicago, Illinois 60604

Re: *Ivelisse G. Rodriguez v. Capital One Home Loans, LLC*, Case No. 08-CV-1723 (N.D. Ill.)

Dear Mr. Hofeld:

We represent defendant HSBC Mortgage Services, Inc. ("HSBC") in the above-referenced action. This letter confirms our telephone conversation yesterday during which you agreed to HSBC's request for an extension of time to and including May 20, 2008, to answer or otherwise plead in response to the complaint. As I mentioned, on April 21, 2008, we intend to file an unopposed motion requesting the Court's approval for the agreed extension.

Thank you for your courtesy in granting HSBC's request for additional time to respond to the complaint.

Very truly yours,



BeLinda I. Mathie

BIM:djd:50479528

cc: Stewart T. Kusper